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*Attorneys for GOOGLE LLC*

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA  
16  
17 SAN FRANCISCO DIVISION

16 SONOS, INC.,

17 Plaintiff,

18 vs.

19 GOOGLE LLC,

20 Defendant.  
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CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF ANNE-RAPHAELLE  
AUBRY IN SUPPORT OF GOOGLE  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL ATTACHMENTS TO ITS BRIEF  
REGARDING DISPUTED  
DEMONSTRATIVES OF DR.  
ALMEROTH**

1 I, Anne-Raphaelle Aubry, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of Massachusetts and am admitted to  
3 practice *pro hac vice* before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP  
4 representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under  
7 Seal Portions of Its Letter Brief Regarding Disputed Demonstratives of Dr. Almeroth (“Brief”). If  
8 called as a witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

10 Document	Portions to be Filed Under Seal	Designating Party
11 Attachment A to Google’s Brief (“Attachment A”)	Entire Document	Google and Sonos
12 Attachment B to Google’s Brief (“Attachment B”)	Entire Document	Google and Sonos

14 4. Attachments A and B contain references to Google’s confidential business information  
15 and trade secrets, including details regarding source code, architecture, and technical operation of  
16 Google’s products and functionalities that Sonos accuses of infringement. The specifics of how these  
17 functionalities operate is confidential information that Google does not share publicly. Thus, public  
18 disclosure of such information could lead to competitive harm to Google as competitors could use  
19 these details regarding the architecture and functionality of Google’s products to gain a competitive  
20 advantage in the marketplace with respect to their competing products. Google has therefore  
21 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY and/ or  
22 HIGHLY CONFIDENTIAL/ATTORNEYS’ EYES ONLY—SOURCE CODE under the protective  
23 order (Dkts. 92, 94).

24 5. Attachments A and B contain regarding confidential business agreements that are not  
25 public, as well as details regarding the future business and commercial plans of partnerships. I  
26 understand that public disclosure of this information would harm Google’s competitive standing and  
27 its ability to negotiate future agreements by giving competitors access to Google’s highly confidential  
28

1 business thinking and asymmetrical information about Google’s collaboration strategies to other  
2 entities. If such information were made public, I understand that Google’s competitive standing  
3 would be significantly harmed. Google has therefore designated this information as HIGHLY  
4 CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the protective order (Dkts. 92, 94). I also  
5 understand that this Court has previously granted sealing of the same and/or similar information. *See,*  
6 *e.g.*, Dkts. 39 at 1; 334 at 3.

7 I declare under penalty of perjury under the laws of the United States of America that to the  
8 best of my knowledge the foregoing is true and correct. Executed on May 7, 2023, in San Francisco,  
9 California.

10 DATED: May 7, 2023

11 By: /s/ Anne-Raphaelle Aubry  
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**ATTESTATION**

I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Anne-Raphaelle Aubry has concurred in the aforementioned filing.

DATED: May 7, 2023

/s/ Sean Pak

Sean Pak